UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:15-MJ-01047-KS-1

UNITED STATES OF AMERICA v. BRANDON S. SAUNDERS	REQUEST FOR DISCOVERY

The defendant hereby requests that the Government comply with the following discovery request, made pursuant to the provisions of Federal Rule of Criminal Procedure 16 and other authorities cited herein. This request is made in order to preserve, on the record, the defendant's requests for discovery. THIS REQUEST DOES NOT REQUIRE ACTION BY THE COURT. For that reason, the requirements of Local Rule 12.2 are not applicable.

(a) The defendant requests that the government allow the inspection and copying or photographing by the defendant of the following:

1. Any relevant written or recorded statements or confessions made by the defendant, or copies thereof, within the possession, custody or control of the Government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the Government.

2. The substance of any oral statement which the Government intends to offer in evidence at the trial made by the defendant, whether before or after arrest, in response to interrogation by any person then known to the defendant to be a Government agent.

3. Any results or reports of physical or mental examinations, and of scientific tests or experiments, or copies thereof, including the results of any polygraph examinations, made in connection with the case and which are material to the preparation of the defense or are intended for use by the Government as evidence in chief at the trial.

4. Any recorded testimony of the defendant before a grand jury which is related to the offense charged.

5. Any books, papers, documents, photographs, tangible objects, buildings or places or copies or portions thereof, which are within the possession, custody or control of the Government, and which are material to the preparation of the defense or are intended for use by the Government as evidence in chief at trial, or were obtained from or belong to the defendant.

6. The Federal Bureau of Investigation identification sheet, or any other list, indicating defendant's prior record.

(b) The defendant further requests that the government disclose to the defendant the following:

1. Any and all information and material known to the Government which may be favorable to the defendant on the issues of guilt or punishment within the scope of Brady v. Maryland, 373 U.S. 83 (1963).

2. The existence and substance of any payments, promises or immunity, leniency or preferential treatment made to prospective Government witnesses within the scope of United States v. Giglio, 405 U.S. 150 (1972) and Napue v. Illinois, 360 U.S. 264 (1959).

3. A record of prior convictions of any alleged co-conspirator accomplice, informant or witness who will testify for the Government at trial.

4. Whether the defendant was the subject of any electronic surveillance, and if so, shall

set forth in detail the circumstances thereof.

5. Any evidence that the government intends to offer at trial pursuant to Rule 404(b) of the Federal Rules of Evidence.

6. The identities of any confidential informants who were actual participants in criminal activities. This request is made pursuant to Roviaro v. United States, 353 U.S. 53, 77 S.Ct. 623, 1 L.Ed.2d 639(1957).

(c) This discovery request is a continuing one and the Government must promptly notify counsel for defendant of the existence of additional evidence or material that is discovered prior to or during trial and is subject to discovery or inspection under any provision of law.

Respectfully requested this 21st day of January, 2015.

THOMAS P. McNAMARA
Federal Public Defender

/s/ Eric J. Brignac
ERIC J. BRIGNAC
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LR 57.1 Counsel
Appointed

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon:

ROBERT W. TAYLOR
Special Assistant United States Attorney
Office of the Staff Judge Advocate
Federal Litigation Section
XVIII Airborne Corps & Fort Bragg
Fort Bragg, North Carolina 28307-5000

by electronically filing the foregoing with the Clerk of Court on January 21, 2015, using the CM/ECF system which will send notification of such filing to the above.

This the 21st day of January, 2015.

/s/ Eric J. Brignac
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